

George T. Jones
Vice President-Nuclear
Engineering & Support

PPL Susquehanna, LLC
Two North Ninth Street
Allentown, PA 18101-1179
Tel. 610.774.7602 Fax 610.774.7797
gtjones@pplweb.com



September 24, 2001

RECEIVED

OCT 2 - 2001

551102

Ms. Carol Hanlon
U. S. Department of Energy
Yucca Mountain Site Characterization Office, (M/S #025)
P.O. Box 30307
North Las Vegas, NV 89036-0307

**SUSQUEHANNA STEAM ELECTRIC STATION
YUCCA MOUNTAIN PRELIMINARY SITE
SUITABILITY EVALUATION COMMENTS
CCN 741126 PLE-22503**

Dear Ms. Hanlon:


PPL Susquehanna, LLC (PPL) is pleased to submit these comments to the Department of Energy (DOE) on the Possible Site Recommendation for Yucca Mountain (66 Fed. Reg. 43,851 – August 21, 2001 and 66 Fed. Reg. 45,845 – August 30, 2001).

PPL strongly supports a DOE decision to recommend Yucca Mountain for development as a repository for commercial used nuclear fuel and radioactive defense waste. The Preliminary Site Suitability Evaluation is the capstone document of a 20-year, \$7 billion scientific site characterization program. It meets the requirements of the Nuclear Waste Policy Act for completing the site characterization phase of the repository development process and proceeding to the next phase – site approval and construction authorization. The Secretary of Energy and President should have high confidence that taking the next step in the repository development process is the scientifically correct action.

DOE has made a preliminary determination that the Yucca Mountain site is suitable for a geologic repository. PPL believes that, following appropriate public review and comment, DOE's final suitability determination should support a recommendation to the President to proceed with the construction of a repository at Yucca Mountain.

Enclosed are specific responses to questions posed by DOE in the "suggested topics for public comment" notice in the August 30 Federal Register.

Sincerely,


George T. Jones

GTJ/ch

Enclosure

①

- a) Please provide your views concerning whether the Yucca Mountain Preliminary Site Suitability Evaluation (PSSE) and other scientific documents produced by the Department provide an adequate basis for finding that the Yucca Mountain site is suitable for development of a repository. If you believe that certain aspects of the PSSE are inadequate, please detail the basis for this belief and indicate how the documentation might be made adequate with respect to these aspects.**

PPL believes that the work done by DOE to prepare the PSSE and other related scientific documents coupled with the critical review and oversight of DOE's Yucca Mountain program provided by the Nuclear Waste Technical Review Board provides an adequate basis for finding that the Yucca Mountain site is suitable for development of a repository.

- b) If the Secretary determines that the scientific analysis indicates that the Yucca Mountain site is likely to meet the applicable radiation protection standards established by the Environmental Protection Agency and Nuclear Regulatory Commission, do you believe that the Secretary should proceed to recommend the site to the President at this time? If not, please explain.**

PPL believes that if the Secretary finds that the scientific analysis indicates that Yucca Mountain is likely to meet the applicable radiation standards established by the EPA and the NRC then the Secretary should proceed to recommend the site to the President at this time.

- c) Are there any reasons that you believe should prevent the President from concluding that the Yucca Mountain site is qualified for the preparation and submission of a construction license application to the Nuclear Regulatory Commission?**

PPL is aware of nothing that would prevent the President from concluding that the Yucca Mountain site is qualified for the preparation and submission of a construction license application to the Nuclear Regulatory Commission.

- d) If you believe that the Secretary should not proceed with a recommendation to develop a repository at Yucca Mountain, what mechanism should be utilized to meet the Department's legal obligation to begin accepting spent nuclear fuel and high level radioactive waste?**

As stated in our response to question b above, PPL believes that if the Secretary finds that the scientific analysis indicates that the Yucca Mountain site is likely to meet the applicable radiation standards, then the Secretary should promptly proceed with a recommendation to develop a repository at Yucca Mountain.

- e) If you believe that the Secretary should not proceed with a recommendation to develop a repository at Yucca Mountain, what measures should the Nation consider for assuring safe disposal of spent nuclear fuel and high level radioactive waste?**

Please see PPL's response to question d.

- f) Please provide any other comments concerning any relevant aspect of the Yucca Mountain site for use as a repository, or that are otherwise relevant to the consideration of a possible recommendation by the Secretary.**

No additional comments.

2